

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

CARL SARA,

a/k/a CARL MARTIN SARA

Defendant.

Criminal No. 1:17-CR-54

Hon. Anthony J. Trenga



STATEMENT OF FACTS

The United States and the defendant, CARL SARA, agree that between in or about May 2013 and in or about August 2013, the defendant used any facility or means of interstate and foreign commerce, specifically the internet, to attempt to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, namely engaging in illicit sexual conduct in a foreign place, in violation of Title 18, United States Code, Section 2422(b). The United States and the defendant further agree that the following facts are true and, had this matter proceeded to trial, the United States would have proven them beyond a reasonable doubt through admissible and credible evidence and testimony:

1. Since at least 2012, the defendant has been the sole user of a registered Yahoo! Inc. (hereafter "Yahoo") email and instant messenger account with the user name "carl_in_dc@yahoo.com" (hereafter the "carl_in_dc" account).
2. Since at least 2012, and continuing until at least in or about 2016, the defendant has used the internet and the "carl_in_dc" account to, among other things, participate in live-

streaming webcam sessions and contemporaneous instant message chatting (“webcam sessions”), over the internet with persons in the Philippines and elsewhere. These webcam sessions were primarily sexual in nature and included demonstrations of minors participating in sexually explicit conduct as that term is defined in 18 U.S.C. § 2256(2)(A).

3. Since at least 2013, the defendant had also engaged in Yahoo chats and webcam sessions, using the “carl_in_dc” account, with another Yahoo user (hereafter referred to as “LM”). LM is an adult living in the Philippines with her then eight-year-old minor daughter (hereafter referred to as “Minor A”).

4. Between in or about May 2013 until in or about July 2013, the defendant and LM discussed and facilitated via chat the defendant’s plans to have sex with LM, Minor A, and other minors, during defendant’s upcoming trip to the Philippines. During these conversations with her mother, he attempted to knowingly persuade, induce, entice, and coerce Minor A to engage in sexual activity with him on that trip. On or about May 30, 2013, the defendant sent \$200 through Western Union to LM upon receiving her agreement that he could have sex with Minor A and that she would assist him in doing so. In addition, he promised to pay LM \$300 more once he had in fact had sex with Minor A.

5. The acts done by the defendant in furtherance of the offense charged in this case, including the acts described above, were at all times done knowingly and intentionally and were not committed by mistake, accident, or other innocent reason.

6. This Statement of Facts includes those facts necessary to support the defendant’s guilty plea guilty to Count 2 of the Superseding Indictment charging him with attempted enticement of a minor, in violation of Title 18, United States Code, Section 2422(b). It does not

include each and every fact known to the defendant or to the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

Respectfully submitted,

Dana J. Boente
United States Attorney

By: 
James E. Burke IV
Special Assistant United States Attorney (LT)

Nathaniel Smith
Assistant United States Attorney

DEFENDANT'S SIGNATURE

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 8-31-2017

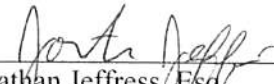


CARL SARA
Defendant

DEFENSE COUNSEL'S SIGNATURE

I am CARL SARA's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 8/31/2017



Jonathan Jeffress, Esq.
Counsel for the Defendant